

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: DARLENE L. LOOKINGBILL	:	CHAPTER 13
Debtor	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
DARLENE L. LOOKINGBILL	:	
Respondent	:	CASE NO. 1-24-bk-00754

TRUSTEE’S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

AND NOW, this 12th day of July 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)’ Plan for the following reason(s):

1. Failure to properly state the liquidation value in Section 1B of the Plan. Trustee calculates it at \$108,672.00.
2. The Trustee avers that Debtor(s)’ Plan is not feasible based upon the following:
 - a. Insufficient Monthly Net Income as indicated on Schedules I and J.
 - b. The Plan is underfunded relative to claims to be paid – 100% Plan. Trustee calculates approximately \$48,560.00 is needed to fully fund the Plan.
3. The Trustee provides notice to the Court as to the ineffectiveness of Debtor(s) Chapter 13 Plan for the following reasons:
 - a. Clarification of Debtor(s) counsel fees which are in conflict with 2016(b) Statement. The fees exceeds the presumptively reasonable fee of \$4,5000.00.

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WHEREFORE, Trustee alleges and avers that Debtor(s) Plan cannot be confirmed and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s) Plan.
- b. Dismiss or convert Debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 12th day of July 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

MICHAEL A CIBIK, ESQUIRE
CIBIK LAW, PC
1500 WALNUT ST, SUITE 900
PHILADELPHIA, PA 19102-

/s/Tammy Life
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee